

DAYLE ELIESON
United States Attorney
District of Nevada
TINA NAICKER, CSBN 252766
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 268-5611
Facsimile: (415) 744-0134
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DONNA L. GRAY

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02307-JAD-NJK

**JOINT STIPULATION AND ~~(PROPOSED)~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL OR REMAND**

(THIRD REQUEST)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from April 26, 2018 to **April 30, 2018**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel was out on leave last week. As a result, Counsel fell behind on her heavy caseload. Counsel has over 75+ pending social security cases, which require two or more dispositive motions a week until late June. Counsel also has to attend an all-day mandatory training on the date of the current filing deadline. Due to current workload demands and unanticipated leave, Counsel needs additional time to adequately review the transcript and properly respond to

1 Plaintiff's Motion for Summary Judgment. Counsel apologizes for the belated request, but did not
2 anticipate seeking additional time due to her unanticipated leave. Defendant makes this request in
3 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the
4 Court's Scheduling Order shall be modified accordingly.

5 Respectfully submitted,

6
7 Dated: April 25, 2018

/s/ *Cyrus Safa
(*as authorized by email on April 25, 2018)
CYRUS SAFA
Attorney for Plaintiff

8
9
10
11 Dated: April 25, 2018

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

12
13
14
15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

16
17
18 **ORDER**
NO FURTHER EXTENSIONS
WILL BE GRANTED.

19 APPROVED AND SO ORDERED:

20
21 DATED: April 26, 2018

22 
HON. NANCY J. KOPPE
23 UNITED STATES MAGISTRATE JUDGE
24
25
26